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April 9, 2020

BY ECF

Hon. Ann Marie Donio, U.S.M.J.
United States District Court for the
District of New Jersey
Michell Cohen Building & Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: Sentinel Insurance Company, Ltd. v. Benedetto, et al.
Civil Action No. 1:19-cv-20142-RMB-AMD

Dear Judge Donio:

Our office represents plaintiff Sentinel Insurance Company, Ltd. ("Sentinel") in the above-referenced action. We write today to seek the Court's confirmation of the new date for Sentinel to file its Motion for Summary Judgment in light of the Coronavirus-related court extensions. As Your Honor is aware, Standing Order 2020-04 extends all filing deadlines in civil matters that fall between March 25, 2020 and April 30, 2020 by forty-five (45) days. The Scheduling Order in this case (copy attached) directs Sentinel to file its dispositive motion by April 30, 2020. Thus, by our read, Sentinel's time to file its dispositive motion is extended to **June 12, 2020**. We would appreciate the Court's confirmation that this date is correct.

On a related matter, on April 8, 2020, Defendants' attorneys filed a motion to withdraw as counsel, returnable on May 4, 2020. As per Standing Order 2020-04, we understand that Defendants' time to Answer is now May 14, 2020 (it had been March 30, 2020). Thus, the time between a decision on the motion to withdraw and Defendants' time to file an Answer is at a minimum only ten (10) days. It remains to be seen whether Defendants will timely file an Answer, but Sentinel wishes to apprise the Court that unless the Court directs otherwise, Sentinel will file its Motion for Summary Judgment on June 12, 2020.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

s/ Patrick D. Bonner, Jr.

Patrick D. Bonner, Jr.

Attachment

cc: All Counsel (By ECF)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

SENTINEL INSURANCE COMPANY,
LTD.,

Plaintiff,

v.

CONRAD J. BENEDETTO,
individually and doing
business as THE LAW OFFICES OF
CONRAD J. BENEDETTO, and JOHN
GROFF,

Defendants.

CONRAD J. BENEDETTO, THE LAW
OFFICES OF CONRAD J. BENEDETTO
and JOHN GROFF,

Plaintiffs,

v.

SENTINEL INSURANCE COMPANY,
LTD., et al.,

Defendants.

Civil No. 19-20142 (RMB/AMD)

SCHEDULING ORDER

This Scheduling Order confirms the directives given to counsel at the scheduling conference, via telephone, pursuant to Rule 16, Federal Rules of Civil Procedure on February 18, 2020; and the Court noting the following appearances: Anthony Scordo, Esquire, appearing on behalf of Conrad J. Benedetto, The Law Offices of Conrad J. Benedetto, and John Groff; and Patrick D. Bonner, Jr., Esquire, appearing on behalf of Sentinel Insurance Company, Ltd.; and good cause appearing for the entry of the within Order:

IT IS on this **18th** day of **February 2020**, hereby **ORDERED**:

1. By consent, no discovery shall be conducted prior to the filing of dispositive motions.

2. **Dispositive Motions**. Dispositive motions shall be filed with the Clerk of the Court no later than **April 30, 2020**. Opposition to the motion should be served in a timely fashion. Counsel are to follow L. Civ. R. 7.1, 7.2, 56.1 and 78.1 (Motion Practice - Generally).

3. Any application for an extension of time beyond the deadlines set herein shall be made in writing to the undersigned and served upon all counsel prior to expiration of the period sought to be extended, and shall disclose in the application all such extensions previously obtained, the precise reasons necessitating the application showing good cause under Fed. R. Civ. P. 16(b), and whether adversary counsel agree with the application. The schedule set herein will not be extended unless good cause is shown.

**THE FAILURE OF A PARTY OR ATTORNEY TO OBEY THIS ORDER
MAY RESULT IN THE IMPOSITION OF SANCTIONS UNDER Fed. R. Civ. P.
16(f).**

s/ Ann Marie Donio

ANN MARIE DONIO
UNITED STATES MAGISTRATE JUDGE

cc: Hon. Renée Marie Bumb